UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

THOMAS GLENWRIGHT, JERRY G. OWENS. WALTER LERMINIAUX, Jr., MICHAEL VOIGHT, BRIAN DESAIN, DAVID J. YAWORSKI, ROBERT TURCHETTI, ROBERT CONGER, DAVID SANTO, WILLE RAY LONON, JOSEPH ACQUISTA, DEARICK L. SMITH, MICHAEL HOLDBROOK, JOSEPH DAHER, JOHN DOE I, JOHN DOE II, & JOHN DOE III

v.

XEROX CORPORATION

PROPOSED DISCOVERY PLAN
Civ. No. 07-cv- 6325

Pursuant to Fed. R. Civ. P. Rule 26(f), the parties in the above-captioned action, by their undersigned counsel, submit the following as their Proposed Discovery Plan:

1. Both parties have (not) consented to Magistrate Judge jurisdiction in this action.

2. Mandatory disclosure pursuant to Fed. R. Civ. P. Rule 26(a)(1) shall be completed on or before November 28, 2007. As of the date of October 31, 2007, Plaintiff shall comply with mandatory disclosure.

3. All motions to amend pleadings or add parties shall be filed on or before December 28, 2007.

4. All factual discovery, including depositions, shall be completed on or before August 28, 2008. All motions to compel discovery shall be filed at least thirty (30) days prior to the factual discovery cutoff.

5. Plaintiff shall identify any expert witness through interrogatories and provide reports pursuant to Fed.R.Civ.P. Rule 26 by June 13, 2008. Defendants shall identify any expert witnesses through interrogatories and provide reports pursuant to Fed.R.Civ.P. Rule 26 by July 18, 2008. All discovery relating to experts including depositions, shall be completed by September 19, 2008.

6. The parties anticipate a Rule 26 (c) order.

7. The parties, at this time, do not contemplate any changes in the limitations in

Fed. R. Civ. P. Rules 30(d) (2) or 33 (a) .

8. Dispositive motions, if any, shall be filed on or before October 3, 2008.

9. The parties request that a status/settlement conference with this Court to be held

after the close of discovery in or about September of 2008.

10. Trial is anticipated to take approximately two (2) weeks.

DATED: October 23, 2007
Rochester, New York

Respectfully submitted,

/s/ Christina A. Agola, Esq.

Christina A. Agola.
Attorney for Plaintiff
730 First Federal Plaza
Rochester, New York 14614
585.262.3320
caaesq@rochester.rr.com